

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

DOCKET FILE COPY ORIGINAL  
RECEIVED

JUL 7 2000

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of )  
 )  
Numbering Resource Optimization ) CC Docket No. 99-200

**EMERGENCY PETITION FOR PARTIAL STAY**

SBC Communications Inc, the Association for Local Telecommunications Services (ALTS) and NEXTLINK Communications Inc. request the immediate stay of that provision of the Commission's Report and Order<sup>1</sup> which limits the period for which telephone numbers can be reserved for designated customer assignment to 45 days, in order to allow the Commission to fully consider the forthcoming recommendations of the North American Numbering Council (NANC) relating to the imposition of fees for extensions of the reserve period.<sup>2</sup> Unless a stay is granted until this issue is resolved, customer confusion and irreparable harm will be the consequence.

As the Commission reflected, "[a] fee on *reserved number* extensions balances a specific customer's desire to reserve access to certain numbers against society's cost of having to use additional NANP resources in order to meet the needs of subscribers of non-reserved numbers."<sup>3</sup> It was for this reason that the Commission requested the NANC reconsider its position on this

---

<sup>1</sup> Report and Order and Further Notice of Proposed Rulemaking, *In the Matter of Number Resource Optimization*, CC Docket No. 99-200, released March 31, 2000. (Report and Order)

<sup>2</sup> Report and Order, para. 25

<sup>3</sup> *Id.*

No. of Copies rec'd 013  
List A B C D E

issue and determine whether a meaningful economic fee structure could be developed<sup>4</sup>. Assuming such a fee structure is developed, the Commission committed it would “reconsider our current position prohibiting the grant of any extensions for *reserved numbers*.”<sup>5</sup>

The NANC has not made its recommendation to the Commission, nor is it likely to do so before this fall. If the 45-day limitation does go into effect and subsequent action is taken by the Commission allowing the extension of the 45-day reserve period, the impact on individual customers would be extremely disruptive.<sup>6</sup> Subscribers, including governmental entities and businesses, who would have paid a fee in order to retain crucial telephone numbers beyond 45 days, will have had no opportunity to do so. The specific sequentially assigned numbers themselves which are currently reserved to these entities are essential to their operations and growth plans. Any lapse between the termination of the 45-day reserve period and that time when the Commission might permit the customer to “extend” the reservation will result in the loss of an irreplaceable resource, i.e., the specific numbers initially reserved to the customer. Since the Report and Order requires carriers to assign all available numbers prior to opening the next thousands-block<sup>7</sup> many, if not all, of these previously reserved numbers will be reassigned

---

<sup>4</sup> In filing for this stay, the parties take no position either, collectively or individually, as to whether the granting of extensions for fees is appropriate or whether a meaningful fee structure can be developed.

<sup>5</sup> *Id.*

<sup>6</sup> Unless a stay is granted, numbers reserved as of the effective date of the Report and Order will be reclassified as available on or about September 1, 2000.

<sup>7</sup> Report and Order, para. 244.

to other customers by the time of the Commission's ruling on the NANC recommendation, precluding the possibility of the previous customers reestablishing their reservation if extensions are subsequently permitted. Clearly, a stay under these circumstances is in the public interest.

Moreover, the granting of this stay will not result in harm to any interested party. The purpose of the stay is simply to maintain the status quo pending a resolution of a matter recognized by the Commission to be outstanding.

If there is an advantage to allowing extensions as the Commission appears to believe, that advantage will be destroyed if a stay is not immediately granted. Such action by the Commission cannot be delayed. Since carriers must proceed with implementing the Report and Order, they soon will be notifying their subscribers of the 45-day limitation. This notification must begin no later than August 1, 2000. If the Commission were to grant this stay after the customer notification, it will only compound customer confusion. Customers making decisions in reliance on the carriers' initial notice of the 45-day period are likely to feel whipsawed by a stay.

## **Conclusion**

For these reasons, the parties strongly urges the Commission to immediately stay its imposition of the 45-day reserve period, until such time as it resolves the issue related to the imposition of fees for the extension of this period. To fail to grant this stay or to delay this action will have an irreparable impact on customers in derogation of the Commission's intent.

Respectfully Submitted,

SBC COMMUNICATIONS INC.

By Hope Thurrott

Hope Thurrott  
Roger K. Toppins  
Alfred G. Richter

1401 I Street NW 11<sup>th</sup> Floor  
Washington, D.C. 20005  
202-326-8891

Its Attorneys

NEXTLINK COMMUNICATIONS INC.

By Dan Gonzalez

Dan Gonzalez  
Director, Regulatory Affairs  
1730 Rhode Island Ave NW  
Suite 1000  
Washington, D.C. 20036  
202-721-0985

Its Attorney

THE ASSOCIATION FOR LOCAL  
TELECOMMUNICATIONS SERVICES

By Theresa Gaugler


Theresa Gaugler  
888 17<sup>th</sup> Street N.W.  
Suite 900  
Washington, D.C. 20006  
202-969-2390

Its Attorney

July 7, 2000

**CERTIFICATE OF SERVICE**

I, Loretia Hill, do hereby certify that on this 7th day of July, 2000, a copy of the foregoing "Motion" was served by U.S. first class mail, postage paid, to the parties listed on the attached sheets.

A handwritten signature in black ink, appearing to read "Loretia Hill", written over a horizontal line.

Loretia Hill

**Service List 99-200**

**LAWERENCE MALONE  
GENERAL COUNSEL  
PUBLIC SERVICE COMMISSION OF THE STATE OF  
NEW YORK  
THREE EMPIRE STATE PLAZA  
ALBANY, NY 12223-1350**

**JAMES S. BLASZAK  
LEVIEN BLASAK BLOCK & BOOTHSEY LLP  
COUNSEL FOR AD HOC TELECOMMUNICATIONS  
USERS COMMITTEE  
2001 L STREET NW  
SUITE 900  
WASHINGTON, DC 20036**

**CHARLES D. COSSON  
AIRTOUCH COMMUNICATIONS  
ONE CALIFORNIA STREET 29<sup>TH</sup> FLOOR  
SAN FRANCISCO, CA 94111**

**PEGGY ARVANITAS  
620 BYPASS DRIVE  
CLEARWATER FL 33764**

**KATHRYN MARIE KRAUSE  
ROBERT MCKENNA  
JAMES T. HANNON  
DAN L. POOLE  
US WEST COMMUNICATIONS, INC  
1020 19<sup>TH</sup> STREET NW SUITE 700  
WASHINGTON, DC 20036**

**JOHNATHAN ASKIN  
ASSOCIATION FOR LOCAL TELECOMMUNICATIONS  
SERVICES  
888 17<sup>TH</sup> STREET NW SUITE 900  
WASHINGTON,DC 20006**

**W. MARK ADAMS ESQ.  
EXECUTIVE DIRECTOR  
NATIONAL EMERGENCY NUMBER ASSOCIATION  
491 CHESHIRE ROAD  
SUNBURY, OH 43074**

**MARK C. ROSENBLUM  
ROY E. HOFFINGER  
JAMES H. BOLIN JR.  
AT&T CORPORATION  
295 NORTH MAPLE AVE  
ROOM 1130M1  
BASKING RIDGE, NJ 07920**

**Service List 99-200**

**JOHNATHAN CHAMBERS  
VICE PRESIDENT-FEDERAL REGULATORY AFFAIRS  
SPRINT CORPORATION  
1801 K STREET NW SUITE M112  
WASHINGTON, DC 20006**

**JOHN M. GOODMAN  
BELL ATLANTIC  
1300 I STREET NW  
SUITE 400 WEST  
WASHINGTON, DC 20005**

**M. ROBERT SUTHERLAND  
THEODORE R. KINGSLEY  
BELL SOUTH CORPORATION  
1155 PEACHTREET STREET NE SUITE 1700  
ATLANTA, GA 30309-3610**

**HUGH BURROWS  
BURROWS RESEARCH GROUP  
PO BOX 5000  
LANARK ONTARIO  
CANADA K0G1K0**

**DAVID ELLEN  
CABLE VISION LIGHTPATH INC  
111 STEWART AVE  
BETHPAGE NY 11714**

**PETER ARTH JR  
LIONEL WILSON  
HELEN M. MICKIEWICZ  
STATE OF CALIFORNIA PUBLIC UTILITIES  
COMMISSION  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102**

**WILLIAM CAMPBELL  
STATE ASSEMBLYMAN  
PO BOX 942849  
SACRAMENTO, CA 94249-0001**

**DOUGLAS CARSON  
PO BOX 12574  
BERKELEY, CA 94712**

**Service List 99-200**

**RANDALL COLEMAN  
LOLITA D. SMITH  
CELLULAR TELECOMMUNICATIONS INDUSTRY  
ASSOCIATION  
1250 CONNECTICUT AVE NW SUITE 800  
WASHINGTON, DC 20036**

**CHERIE R. KISER  
GIL M. STROBLE  
FRANK W. LLOYD  
DONNA N. LAMPERT  
HOWARD J SYMONS  
SARA F. SEIDMAN  
MINTZ, LEVIN, COHN, FERRIS, GLOVSKY AND POPEO,  
PC  
701 PENNSYLVANIA AVE NW SUITE 900  
WASHINGTON, DC 20004**

**DAVID L. MEIER  
CINCINNATI BELL TELEPHONE COMPANY  
201 E FOURTH STREET  
CINCINNATI, OH 45201-2301**

**ROBERT KELTER  
J SEAMUS GYNN  
CITIZENS UTILITY BOARD OF ILLINOIS  
208 S. LASALLE, SUITE 1760  
CHICAGO, IL 60604**

**MARSHA N COHEN  
2201 LYON STREET  
SAN FRANCISCO, CA 94115**

**LARRY BLOSSER  
KEMAL HAWA  
SWINDLER, BERLIN, SHEREFF, FRIEDMAN LLP  
COUNSEL FOR CONNECT COMMUNICATIONS  
3000 K STREET SUITE 300  
WASHINGTON, DC 20007**

**REBECCA M. QUINTANA  
CHAIR  
COLORADO NUMBERING TASK FORCE  
1580 LOGAN STREET  
DENVER, CO 80203**

**RAYMOND GIFFORD  
COLORADO PUBLIC UTILITIES COMMISSION  
1580 LOGAN STREET  
SUITE 740  
DENVER, CO 80203**

**Service List 99-200**

**LOUISE RICKARD  
ACTING EXECUTIVE SECRETARY  
STATE OF CONNECTICUT  
DEPARTMENT OF PUBLIC CONTROL  
10 FRANKLIN SQUARE  
NEW BRITAIN, CT 06051**

**JG HARRINGTON  
DOW, LOHNES & ALBERTSON PLLC  
COUNSEL FOR COX COMMUNICATIONS INC  
1200 NEW HAMPSHIRE AVENUE NW  
SUITE 800  
WASHINGTON, DC 20036**

**RICHARD EYRE  
PO BOX 2408  
TEMPE, AZ 85280-2480**

**CYNITHIA B. MILLER  
FLORIDA PUBLIC SERVICE COMMISSION  
2540 SHUMARD OAK BLVD  
TALLAHASSEE, FL 32399-0850**

**RICHARD METZGER  
MATTHEW H. BERNIS  
FOCAL COMMUNICATIONS CORPORATION  
200 NORTH LASALLE STREET  
CHICAGO, IL 60601**

**ANDRE J. LACHANCE  
GTE SERVICE CORPORATION  
1850 M STREET NW SUITE 1200  
WASHINGTON, DC 20036**

**ILLINOIS CHAPTER OF NATIONAL ENERGY NUMBER  
ASSOCIATION  
LOVES PARK 9-1-1  
LOVES PARK DRIVE  
LOVES PARK, IL 61111**

**CAROL SALVA  
632 14<sup>TH</sup> STREET  
SANTA MONICA, CA 904020**

**Service List 99-200**

**DANA FRIX  
SWINDLER, BERLIN SHREFF FRIEDMAN LLP  
COUNSEL FOR CHOICE ONE COMMUNICATIONS INC  
AND GST TELECOMMUNCAITONS  
3000 K STREET NW , SUITE 300  
WASHINGTON, DC 20007**

**PAUL GLIST  
COLE RYWID & BRAVERMAN  
1919 PENNSYLVANIA AVE NW SUITE 200  
COUNSEL FOR CENTURY COMMUNICATIONS CORP  
AND CENTENNIAL CELLULAR  
WASHINGTON,DC 20007**

**SUSAM W. SMITH  
DIRECTOR-EXTERNAL AFFIARS  
CENTURYTEL WIRELESS INC  
3505 SUMMERHILL RAOD  
NO 4 SUMMER PLACE  
TEXARKANA, TX 75501**

**MARK J. BURZYCH  
ATTORNEY FOR THUMB CELLULAR LIMITED  
PARTNERSHIP  
FOSTER SWIFT COLLINS & SMITH PC  
313 SOUTH WASHINGTON SQUARE  
LANSING, MI 48933-2193**

**KENNETH E. HARDMAN  
ATTORNEY FOR TRILLIUM CELLULAR CORP  
MOIR AND HARDMAN  
1828 L STREET NW  
SUITE 901  
WASHINGTON, DC 20036-5104**

**MELISSA CARO  
ALBERTO LEVY PHD  
TEXAS OFFICE OF PUBLIC UTILITY COUNSEL  
1701 NORTH CONGRESS AVENUE  
SUITE 9-180  
PO BOX 12397  
AUSTIN, TX 78711-2397**

**RUSELL M. BLAU  
MICHAEL ROMANO  
JEANNE STOCKMAN  
SWINDLER BERLINE SHEREFF FRIEDMAN, LLP  
COUNSEL FOR RCN TELECOM SERVICES  
3000 K STREET SUITE 300  
WASHINGTON, DC 20007**

**MICHAEL R. ROMANO  
SWIDLER, BERLIN SHEREFF, FRIEDMAN, LLP  
COUNSEL FOR LEVEL 3 COMMUNICATIONS  
3000 K STREET NW SUITE 300  
WASHINGTON, DC 20007**

**Service List 99-200**

**EDWARD A. YORKITIS, JR  
KELLEY DRYE & WARREN LLP  
ATTORNEYS FOR LIBERTY COMMUNICATIONS  
1200 19<sup>TH</sup> STREET SUITE 500  
WASHINGTON, DC 20036**

**TRINA M. BRAGDON  
MAINE PUBLIC UTILITIES COMMISSION  
242 STATE STREET  
18 STATE HOUSE STATION  
AUGUSTA, ME 04333-0018**

**THE HONORABLE JANET GAIL BESSER  
CHAIR  
COMMONWEALTH OF MASSACHUSETTES  
DEPARTMENT OF TELECOMMUNICATIONS AND  
ENERGY  
ONE SOUTH STATION  
2<sup>ND</sup> FLOOR  
BOSTON, MA 02110**

**MARY DE LUCA  
ANNA F LA LENA  
MCI WORLD COMM INC  
1801 PENNSYLVANIA AVE NW  
WASHINGTON, DC 20006**

**SUSAN M. EID  
RICHARD A. KARRE  
MEDIAONE GROUP INC  
1919 PENNSYLVANIA AVE NW, SUITE 610  
WASHINGTON, DC 20006**

**ANN SEHA  
ASSISTANT ATTORNEY GENERAL  
MANAGER, PUBLIC UTILITIES DIVISION  
121 7<sup>TH</sup> PLACE EAST, SUITE 350  
ST. PAUL, MN 55101**

**WILLIAM K. HAAS  
DAN JOYCE  
MISSOURI PUBLIC SERVICE COMMISSION  
ROOM 750  
301 WEST HIGH STREET  
JEFFERSON CITY, MO 65102**

**Service List 99-200**

**DR. H. GILBERT MILLER  
VICE PRESIDENT  
MITRETEK SYSTEMS INC  
CENTER FOR TELECOMMUNICATIONS AND  
ADVANCED TECHNOLOGY  
7525 COLSHIRE DRIVE  
MCLEAN, VA 22102**

**DON WOODFORD  
MOBILITY CANADA  
1420 BLAIR PLACE, SUITE 700  
GLOUCESTER ONTARIO  
K1J 9L8**

**CAROL ANN BISCHOFF  
ROBER MCDOWELL  
COMPETITIVE TELECOMMUNICATIONS ASSOCIATION  
1900 M STREET NW SUITE 800  
WASHINGTON, DC 20036**

**JAMES BRADFORD RAMSAY  
NATIONAL ASSOCIATION OF REGULATORY  
UTILITY COMMISSIONERS  
1101 VERMONT AVE NW SUITE 200  
WASHINGTON, DC 20005**

**JOHN F. RAPOSA  
GTE SERVICE CORPORATION  
600 HIDDEN RIDGE, HQE03J27  
PO BOX 152092  
IRVING, TX 75015-2092**

**JEFFERY S. LINDER  
WILEY REIN & FIELDING  
ATTORNEY FOR GTE SERVICE CORPORATION  
1776 K STREET NW  
WASHINGTON, DC 20006**

**TINA S. PYLE  
RICHARD A. KARRE  
MEDIAONE GROUP, INC  
1919 PENNSYLVANIA AVE NW  
SUITE 610  
WASHINGTON, DC 20006**

**BILL HINKLE  
MARK ADAMS ESQ  
NATIONAL EMERGENCY NUMBER ASSOCIATION  
491 CHESHIRE ROAD  
SUBURY, OH 43074**

**Service List 99-200**

**RICHARD A. ASKOFF  
REGINA MCNEIL  
NATIONAL EXCHANGE CARRIER ASSOCIATION INC  
100 SOUTH JEFFERSON ROAD  
WHIPPANY NJ 07981**

**NATIONAL TELEPHONE COOPERATIVE ASSOCIATION  
L. MARIE GUILLORY  
JAN CANFIELD  
4121 WILSON BOULEVARD  
TENTH FLOOR  
ARLINGTON, VA 22203-1801**

**E BARCLAY JACKSON  
NEW HAMPSHIRE PUBLIC UTILITIES COMMISSION  
8 OLD SUN COOK ROAD  
CONCORD, NH 03301**

**JOHN J. FARMER JR  
NEW JERSEY BOARD OF PUBLIC UTILITIES  
DIVISION OF LAW  
124 HALSEY STREET  
5<sup>TH</sup> FLOOR  
PO BOX 45029  
NEWARK, NJ 07101**

**CHERYL L. CALLAHAN  
ASSISTANT COUNSEL  
NEW YORK STATE PUBLIC SERVICE COMMISSION  
THREE EMPIRE STATE PLAZA  
ALBANY, NY 12223-1350**

**DAVID L. MARTIN  
DOW LOHNES & ALBERTSON PLLC  
COUNSEL FOR NEXTEL COMMUNICATIONS INC  
1200 NEW HAMPSHIRE AVENUE NW SUITE 800  
WASHINGTON, DC 20036**

**ROBERT FOOSANER  
LAWRENCE R. KREVOR  
LAURA L. HOLLOWAY  
NEXTEL COMMUNICATIONS, INC  
2001 EDMUND HALLEY DRIVE  
RESTON, VA 20191**

**DANIEL GONZALEZ  
JASON WILLIAMS  
NEXTLINK COMMUNICATIONS INC  
1730 RHODE ISLAND AVE NW  
SUITE 1000  
WASHINGTON, DC 20036**

**Service List 99-200**

**JANE WHANG  
DAVIS WRIGHT TREMAINE LLP  
COUNSEL FOR NEXTLINK COMMUNICATIONS  
1155 CONNECTICUT AVE NW SUITE 700  
WASHINGTON, DC 20036**

**RONALD R. CONNERS  
NORTH AMERICAN NUMBERING PLAN  
ADMINISTRATOR  
1133 15<sup>TH</sup> STREET NW 12<sup>TH</sup> FLOOR  
WASHINGTON, DC 20005**

**PROFESSOR BILL NIELL  
PO BOX 33666  
SAN DIEGO, CA 92163-3666**

**LES SELZER  
COMMON CARRIER BUREAU  
FEDERAL COMMUNICATIONS BUREAU  
THE PORTALS  
445 12<sup>TH</sup> STREET SW  
WASHINGTON, DC 20554**

**AARON GOLDBERGER  
COMMON CARRIER BUREAU  
FEDERAL COMMUNICATIONS COMMISSION  
THE PORTALS  
445 12<sup>TH</sup> STREET SW  
WASHINGTON, DC 20554**

**RONALD BINZ  
CO-CHAIRMAN  
NORTH AMERICAN NUMBERING COUNCIL  
COMPLETION POLICY INSTITUTE  
3773 CHERRY CREEK NORTH DRIVE  
SUITE 1050  
DENVER, CO 80209**

**ANTOINETTE R. WIKE  
CHIEF COUNSEL  
NORTH CAROLINA PUBLIC UTILITY UTILITIES  
COMMISSION  
PO BOX 29520  
RALEIGH, NC 27626-0520**

**MARK J TAUBER  
MARK J O'CONNER  
OMNIPONT CORPORATION  
PIPER & MARBURY LLP  
1200 19<sup>TH</sup> STREET NW 7<sup>TH</sup> FLOOR  
WASHINGTON, DC 20036**

**Service List 99-200**

**JUDITH ST. LEGER-ROTY  
MICHAEL B. HAZZARD  
KELLY DRYE & WARREN, LLP  
PAGING NETWORK, INC  
1200 19<sup>TH</sup> STREET NW 5<sup>TH</sup> FLOOR  
WASHINGTON, DC 20036**

**DAVID E. SCREVEM  
FRANK B. WILMARTH  
PENNSYLVANIA PUBLIC UTILITY COMMISSION  
PO BOX 3265  
HARRISBURG, PA 17105-3265**

**JOEL HL. CHESKIS  
PENNSYLVANIA OFFICE OF CONSUMER ADVOCATE  
555 WALNUT STREET 5<sup>TH</sup> FLOOR FORUM PLACE  
HARRISBURG, PA 17101**

**MERY MC DERMOTT  
ROBERT L. HOGGARTH  
PERSONAL COMMUNICATIONS INDUSTRY  
ASSOCIATION  
500 MONTGOMERY STREET , SUITE 700  
ALEXANDRIA, VA 22314**

**DENNIS THRO  
1226 TRINITY CHURCH ROAD  
WRIGHTSBILLE, PA 17368**

**CRAIG A. GLAZER, CHAIRMAN  
PUBLIC COMMISSION OF OHIO  
180 E. BROAD STREET  
COLUMBUS , OH 43215**

**MELISSA CARA  
ALBERTO LEVY Ph.D.  
TEXAS OFFICE OF PUBLIC UTILITY COUNSEL  
1701 NORTH CONGRESS AVENUE  
SUITE 9-180  
PO BOX 12397  
AUSTIN, TX 78711-2397**

**TERESA K. GAUGLER  
JANE KUKA  
QWEST COMMUNICATIONS CORPORATION  
4250 NORTH FAIRFAX DRIVE  
ARLINGTON, VA 22203**

**Service List 99-200**

**RUSSELL BLAU  
MICHAEL R. ROMANO  
JEANNE W. STOCKMAN  
SWIDLER, BERLIN, SHEREFF, FRIEDMAN LLP  
COUNSEL FOR MFS COMMUNICATIONS GROUP INC. &  
RCN TELECOM SERVICES INC  
3000 K STREET NW 300  
WASHINGTON, DC 20007**

**RICHARD EYRE  
REC NETWORKS  
PO BOX 2408  
TEMPE, AZ 8520-2408**

**WILLIAM P. HUNT III  
LEVEL 3 COMMUNICATIONS INC  
1450 INFINITE DRIVE  
LOUISVILLE, CO 80027**

**DAWN HUNT  
ROGERS CANTEL INC  
33 BLOOR STREET EAST  
TORONTO ONTARIO  
M4W 1G9  
CANADA**

**THERESA FENELON FALK  
PILLSBURY, MADISON & SUTRO LLP  
COUNSEL FOR SACO RIVER TELEGRAPH AND  
TELEPHONE COMPANY  
1100 NEW YORK AVE NW  
NINTH FLOOR  
EAST TOWER  
WASHINGTON, DC 20005**

**CARL K. OSHIRO  
COUNSEL FOR SMALL BUSINESS ALLIANCE FOR FAIR  
UTILITY REGULATION  
100 FIRST STREET SITE 2540  
SAN FRANCISCO, CA 94105**

**JAMES J. MC CULLOUGH  
DENEEN J. MELANDER  
ANDREW D. SKOWRONEK  
FRIED, FRANK, HARRIS, SHRIVER & JACOBSON  
COUNSEL FOR TELECORDIA TECHNOLOGIES INC.  
1001 PENNSYLVANIA AVE NW SUITE 800  
WASHINGTON, DC 20004-2505**

**JAY C. KEITHLEY  
SPRINT CORPORATION  
1850 M STREET NW  
SUITE 1110  
WASHINGTON, DC 20036-5807**

**Service List 99-200**

**MICHAEL A. SULLIVAN  
15 SPENCER AVENUE  
SOMERVILLE, MA 02144**

**RICHARD A. MUSCAT  
COUNSEL FOR TEXAS ADVISORY COMMISSION STATE  
EMERGENCY COMMUNICATIONS  
THE GONZA'LEZ LAW FIRM  
ONE WESTLAKE PLAZA  
1705 SOUTH CAPITAL OF TEXAS HIGHWAY  
SUITE 100  
AUSTIN, TX 78746**

**BRIAN CONROY  
THOMAS A. JONES  
DAVID DON  
WILLKIE, FARR & GALLAGHER  
COUNSEL FOR TIME WARNER TELECOM HOLDING  
INC d/b/a TIME WARNER TELECOM  
THREE LAFAYETTE CENTER  
1155 21<sup>ST</sup> STREET NW  
WASHINGTON, DC 20036**

**MELLISA CARO  
ALBERTO LEVY Ph.D.  
TEXAS OFFICE OF PUBLIC UTILITY COUNSEL  
1701 NORTH CONGRESS AVE  
SUITE 9-180  
P.O. BOX 12397  
AUSTIN, TEXAS 78711-2397**

**LAWRENCE E. SARJEANT  
LINDA L. KENT  
KEITH TOWNSEND  
JULIE L. RONES  
UNITED STATES TELECOM ASSOCIATION  
1401 H STREET, NW  
SUITE 600  
WASHINGTON, DC 20005**

**KATHARYN MARIE KRAUSE  
ROBERT B. MCKENNA  
DAN L. POOLE  
US WEST COMMUNICATIONS, INC  
1020 19<sup>TH</sup> STREET NW  
SUITE 700  
WASHINGTON, DC 20036**

**BRIAN O'CONNOR  
VOICESTRAM WIRELESS CORPORATION  
1300 PENNSYLVANIA AVE NW SUITE 700  
WASHINGTON, DC 20004**

**ROBERT W. MCAUSLAND  
ALLEGIANCE TELECOMM INC.  
1950 STEMMONS FREEWAY  
SUITE 3026 DALLAS, TX 75207**

**Service List 99-200**

**CLAY BAILEY  
CENTURYTEL INC  
100 CENTURY PARK DRIVE  
MONROE, LA 71203**

**LARRY A. BLOSSER ESQ  
KEMAL HAWA ESQ  
SWINDLER, BERLIN, SHEREFF, FRIEDMAN, LLP  
COUNSEL FOR CONNECT COMMUNICATIONS  
CORPORATION  
3000 K STREET NW  
SUITE 300  
WASHINGTON, DC 20007**

**WILLIAM IRBY  
DIRECTOR  
VIRGINIA STATE CORPORATION COMMISSION  
BOX 1197  
RICHMOND, VA 23218**

**RICHARD LEVINE  
BETA SCIENTIFIC LABORATORY INC  
PO BOXD 836224  
RICHARDSON, TX 75083-6224**

**RICHARD A. DIVINE  
DAVID L. HEATON  
COOK COUNTY STATE'S ATTORNEY OFFICE  
ENVIRONMENT & ENERGY DIVISION  
69 WEST WASHINGTON STREET  
CHICAGO, IL 60602**

**LAURENCE E. HARRIS  
DAVID S. TURETSKY  
TERRI B. NATOLI  
TELIGENT INC  
8065 LEESBURG PIKE  
VIENNA, VA 22182**

**JOHN MCHUGH  
STUART POLIKOFF  
ORGANIZATION FOR THE PROMOTION AND  
ADVANCEMENT OF SMALL TELECOMMUNICATIONS  
COMPANIES  
21 DUPONT CIRCLE  
SUITE 700  
WASHINGTON, DC 20036**

**MAGALIE ROMAN SALAS  
SECRETARY  
FEDERAL COMMUNICATIONS-COMMISSION  
445 12<sup>TH</sup> STREET, SW  
WASHINGTON, DC 20554**

**Service List 99-200**

**ARI FITZGERALD  
LEGAL ADVISOR  
OFFICE OF COMMISSIONER WILLIAM E. KENNARD  
FEDERAL COMMUNICATIONS COMMISSION  
445 12<sup>TH</sup> STREET, SW  
WASHINGTON, DC 20554**

**LAWRENCE STRICKLING  
CHIEF, COMMON CARRIER BUREAU  
FEDERAL COMMUNICATIONS COMMISSION  
445 12<sup>TH</sup> STREET SW  
WASHINGTON, DC 20554**

**KEVIN MARTIN  
LEGAL ADVISOR  
OFFICE OF COMMISSIONER HAROLD FURGHGOTT-  
ROTH  
FEDERAL COMMUNICATIONS COMMISSION  
445 12<sup>TH</sup> STREET SW  
WASHINGTON, DC 20554**

**YOG VARMA  
DEPUTY CHIEF  
COMMON CARRIER BUREAU  
FEDERAL COMMUNICATIONS COMMISSION  
445 12<sup>TH</sup> STREET SW  
WASHINGTON, DC 20554**

**MARK SCHNEIDER  
OFFICE OF COMMISSIONER SUSAN NESS  
FEDERAL COMMUNICATIONS COMMISSION  
445 12<sup>TH</sup> STREET SW  
WASHINGTON, DC 20554**

**BLAISE A. SCINTO  
DEPUTY CHIEF, NETWORK SERVICES DIVISION  
COMMON CARRIER BUREAU  
FEDERAL COMMUNICATIONS COMMISSION  
445 12<sup>TH</sup> STREET SW, SUITE 6-A207  
WASHINGTON, DC 20554**

**AL MCCLOUD  
NETWORK SERVICES DIVISION  
COMMON CARRIER BUREAU  
FEDERAL COMMUNICATIONS COMMISSION  
445 12<sup>TH</sup> STREET SW  
WASHINGTON, DC 20554**

**DOUGLAS PRICHARD  
CITY MANAGER  
ROLLING HILLS ESTATES  
4045 PALOS VERDES DRIVE NORTH  
ROLLING HILLS ESTATES, CA 90274**

**Service List 99-200**

**DIANE GRIFFTH HARMON  
DEPUTY CHIEF, NETWORK SERVICES DIVISION,  
COMMON CARRIER BUREAU  
FEDERAL COMMUNICATIONS COMMISSION  
445 12<sup>TH</sup> STREET SW  
WASHINGTON , DC 20554**

**TEJAL MEHTA  
FEDERAL COMMUNICATIONS COMMISSION  
445 12<sup>TH</sup> STREET SW  
WASHINGTON, DC 20554**

**THE HONORABLE JANET GAIL BESSER, CHAIR  
COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF TELECOMMUNICATIONS AND  
ENERGY  
100 CAMBRIDGE STREET 12<sup>TH</sup> FLOOR  
BOSTON , MA 02202**

**THE HONORABLE JAMES CONNELLY  
COMMISSIONER  
COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF TELECOMMUNICATIONS AND  
ENERGY  
100 CAMBRIDGE STREET 12<sup>TH</sup> FLOOR  
BOSTON, MA 02202**

**THE HONORABLE W. ROBERT KEATING, COMM.  
COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF TELECOMMUNICATIONS AND  
ENERGY  
100 CAMBRIDGE STREET, 12<sup>TH</sup> FLOOR  
BOSTON, MA 02202**

**ITS  
445 12<sup>TH</sup> STREET SW  
WASHINGTON, DC 20554**

**MISSOURI OFFICE OF PUBLIC COUNSEL  
PO BOX 7800  
JEFFERSON CITY, MO 65102**

**FLORIDA OFFICE OF PUBLIC COUNSEL  
C/O FLORIDA LEGISLATURE  
111 WEST MADISON STREET #812  
TALLAHASSEE, FL 32399**

**Service List 99-200**

**INDIANA OFFICE OF UTILTIY CONSUMER COUNSEL  
100 N. SENATE AVENUE ROOM N501  
INDIANAPOLIS, IN 46204-2494**

**MARYLAND OFFICE OF PUBLIC COUNSEL  
6 ST PAUL STREET SUITE 2102  
BALTIMORE, MD 21202**

**THE OFFICE OF THE PEOPLE'S COUNSEL  
DISTRICT OF COLUMBIA  
1133 15<sup>TH</sup> STREET NW SUITE 500  
WASHINGTON, DC 20005**

**CALIFORNIA OFFICE OF RATEPAYER ADVOCATES  
505 VAN NESS AVENUE ROOM 4202  
SAN FRANCISCO, CA 94102**

**THE UTILITY REFORM NETWORK  
711 VAN NESS AVE SUITE 350  
SAN FRANCISO,CA 94102**

**MAINE PUBLIC ADVOCATE  
STATE HOUSE STATION 112  
AUGUSTA, MAINE 04333**

**BENJAMIN H. DICKENS JR  
MIDVALE TELEPHONE EXCHANGE INC  
NORTHEAST LOUISANA TELEPHONE  
INTERSTATE TELECOMMUNICATIONS CORP.  
RADIO PAGING SERVICE  
2120 I STREET NW  
WASHINGTON, DC 20037**

**JAMES TROUP  
IOWA TELECOMMUNICATIONS SERVICES  
ARTER & HADDEN LLP  
1800 K STREET NW SUITE 400  
WASHINGTON, DC 20006**

**Service List 99-200**

**TEYA M. PENNIMAN  
OREGON PUBLIC UTILITY COMMISSION  
550 CAPITOL STREET NE  
SALEM, OR 97310-1380**

**JOHN KUYKEDALL  
KRANSIKIN, LESSE & COSSON, LLP  
RURAL INDEPENDENT COMPETITIVE ALLIANCE  
2120 L STREET NW SUITE 520  
WASHINGTON, DC 20036**

**GENERAL SERVICE ADMINISTRATION  
1800 F STREET NW RM 4002  
WASHINGTON, DC 20405**

**JOHNATHAN E. CANIS  
KELLEY DRYE & WARREN LLP  
ATTORNEYS FOR 2<sup>ND</sup> CENTURY COMMUNICATIONS  
1200 19<sup>TH</sup> STREET NW SUITE 500  
WASHINGTON, DC 20036**

**2<sup>ND</sup> CENTURY COMMUNICATIONS INC  
7702 WOODLAND CENTER BOULEVARD  
SUITE 50  
TAMPA, FL 33614**

**JOHN T. SCOTT, III  
VICE-PRESIDENT AND DEPUTY GENERAL COUNSEL  
VERIZON WIRELESS  
1001 PENNSYLVANIA AVE NW  
WASHINGTON, DC 20004-2595**